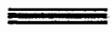
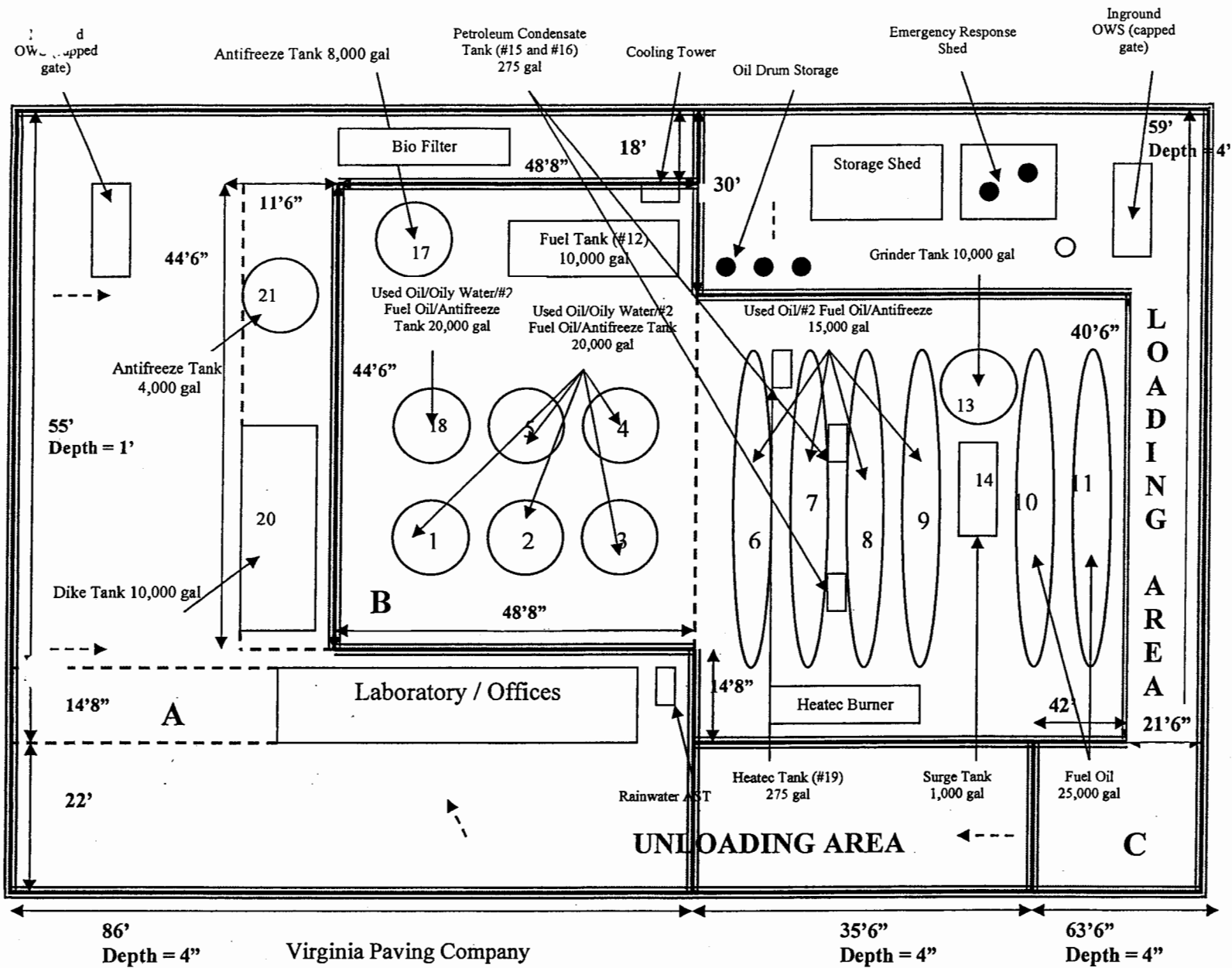


Attachment #1

BACKLICK RUN



Truck Unloading Containment Area



Truck Loading Containment Area (Finished Product Loading)

N

NOT TO SCALE

Attachment #2

NAME:	TECH #	DATE	START TIME	STOP TIME	TOTAL HOURS	TRUCK #
-------	--------	------	------------	-----------	-------------	---------

ID #	START TIME	NAME OF CUSTOMER	STREET	QTY PICKED UP	COMMENTS
SO #	STOP TIME		CITY/STATE/ZIP		

ID #	START TIME	NAME OF CUSTOMER	STREET	QTY PICKED UP	COMMENTS
SO #	STOP TIME		CITY/STATE/ZIP		

ID #	START TIME	NAME OF CUSTOMER	STREET	QTY PICKED UP	COMMENTS
SO #	STOP TIME		CITY/STATE/ZIP		

ID #	START TIME	NAME OF CUSTOMER	STREET	QTY PICKED UP	COMMENTS
SO #	STOP TIME		CITY/STATE/ZIP		

ID #	START TIME	NAME OF CUSTOMER	STREET	QTY PICKED UP	COMMENTS
SO #	STOP TIME		CITY/STATE/ZIP		

TOTALS

SIEMENS SITES LOAD/UNLOAD TIMES

LOCATION	START TIME	STOP TIME	TOTAL TIME	LOAD	UNLD	QTY

OFFSITE DISPOSAL UNLOADING TIMES

LOCATION	S.O. OR MANIFEST #	START TIME	STOP TIME	TOTAL TIME	QTY.	PRODUCT

OTHER DOWN TIME CODES

LOCATION	START TIME	STOP TIME	TOTAL TIME	CODE	REASON

BRAK - take break
 FLOT - floating holiday
 FUEL - fuel truck
 FUNE - funeral leave
 HOLI - holiday
 HOTL - hot load down time
 OODH - out of DOT driving hours
 PAPR - paperwork
 SAFE - safety meeting
 SALE - sales calls
 SICK - sick
 TRIP - pre-trip/post-trip

INVE - inventory adjustment
 JURY - jury duty
 LOAD - load time
 LUNC - eat lunch
 MEDI - medical leave
 MISC - give specifics
 TRAN - training
 UNLD - unload time
 VACA - vacation
 VEHI - vehicle repair/maint
 WASH - wash truck/pump
 YARD - give specifics



Manager Signature

Date

SERVICE ACTIVITY REPORT

FCC environmental Receiving Report

304026

- ☐ 5501 Courtney Avenue, Alexandria, VA 22304
(703) 370-8124 • EPA# VAD980537302
- ☐ 2353 Lanier Road, Rockville, VA 23146
(804) 749-8344 • EPA# VAD988222998
- ☐ 3481 South Military Highway, Chesapeake, VA 23323
(757) 558-3029 • EPA# VAD000372995
- ☐ Westbound Lane Rt. 460, Montvale, VA 24122
(540) 947-2864 • EPA# VAR00006387
- ☐ 2115 Speedrail Court, Concord, NC 28025
(704) 455-6863 • EPA# NCR000003319

HYDROCARBON SERVICES

- ☐ 505 South Market Street, Wilmington, DE 19801
(800) 222-2511 • EPA ID# DED984073692
- ☐ 250 E. 22nd St., Bayonne, NJ 07002
(800) 222-2511 • EPA ID# NJR000025486
- ☐ 6305 East Lombard Street, Baltimore, MD 21224
(410) 633-0606 • EPA ID# MDD985389816
- ☐ 201 Lindsay Road, Zellenople, PA 16063
(724) 453-0623 • EPA ID# PAD982700783
- ☐ _____

Date	Transporter #	Tank #
------	---------------	--------

Section 1 - Received From

Company Name
Address
EPA ID#

Section 2 - Description of Product

HM

☐ ☐ Non-DOT Regulated Used Oil

☐ Fuel Oil, Combustible Liquid, 3, NA 1993, PG III

☐ Petroleum Oil, Combustible Liquid, 3, NA 1270, PG III

☐ RQ, Other Regulated Substances, Liquid n.o.s., 9, NA 3082, PG III (Ethylene Glycol)

☐ Fuel, aviation, turbine engine, 3, UN 1863, PG III

☐ Flammable liquid, n.o.s.(Petroleum Product), 3, UN 1993, PG III

☐ ☐ Oily Water, Non-DOT Regulated

☐ ☐ _____

Section 3 - Transporter

Name
Address
EPA ID#

- ☐ Transporter Only - Generator Certification Applies.
- ☐ I certify that this material is not a hazardous waste. I further certify that the material does not contain PCBs, has not been mixed with any listed hazardous waste, is not ignitable and does not contain more than 1,000 parts per million halogens. I understand my business will be responsible for any and all costs of proper disposal, testing, and transportation if this material contains PCBs or is determined to be a hazardous waste.
- ☐ I certify that this used oil is not a hazardous waste and may be managed in accordance with 40 CFR 279. Any presumption of mixing with hazardous waste has been rebutted by means of analytical results, process knowledge, or because the hazardous contamination is known to be solely the result of conditionally exempt small quantity generator hazardous waste or D-I-Y hazardous waste.
- ☐ I certify that the material presented for collection is a commercial product, co-product, or off-specification product and is not a solid waste. It is being offered for the purpose of recycling.

Transporter Signature

Facility Signature

Section 4 - Scale Readings

Scale	Product
Truck #:	Weight/Gal:
Gross Weight:	Gross Gal:
Tare Weight:	
Net Weight:	

Section 5 - Product Analysis

Oil	Antifreeze/Water
Water:	Glycol %:
Sediment:	Freeze Pt °F:
BS&W:	pH:
Halogens:	Urea:
Flash Point °F:	Other:
PCB:	Other:
Arsenic:	
Cadmium:	
Chromium:	
API/PPG:	

Section 6 - Payment

<input type="checkbox"/> Pay	<input type="checkbox"/> Charge	Amount
Gallons:	Price/Gal:	
Freight		
Misc.		
Sub-Total		
Sales Tax		
Total		
Purchase Order Number		
Sales Person _____ Commisionable <input type="checkbox"/>		
Comments: _____		
Please remit all payments to: Hydrocarbon Recovery Services, Inc. Box 757600 Philadelphia, PA 19175-7600		

White - Office

Yellow - Plant

Pink - Transporter

Goldenrod - Customer/Driver

Attachment #3

Used Oil Analysis Plan

This program supersedes
any existing programs.

FCC ENVIRONMENTAL, LLC

Location:

ALEXANDRIA

March 2008

Used Oil Analysis Plan

Table of Contents

Section	Page
1.0 Introduction	1
2.0 Regulatory Authority	1
3.0 Definitions	1
4.0 References	2
5.0 Responsibility	2
6.0 Used Oil Analysis Plan Requirements	2
7.0 Records Required / Records Retention	4
8.0 Forms Required	4
9.0 Exhibits	4
10.0 Site Specific Processing Facility Information	4
 Exhibit 1 Operating Record (Log) Example	 7

1.0 Introduction

Owners or operators of used oil processing and re-refining facilities must develop and follow a written analysis plan describing the procedures that will be used to comply with the Rebuttable Presumption for Used Oil requirements of 40CFR 279.53 and, if applicable, the On-Specification Used Oil Fuel Analysis requirements in 40CFR 279.72. The owner or operator must keep the plan at the facility.

2.0 Regulatory Authority

40 CFR 279, Standards for the Management of Used Oil.

3.0 Standards for the Management of Used Oil Definitions

Petroleum refining facility means an establishment primarily engaged in producing gasoline, kerosene, distillate fuel oils, residual fuel oils, and lubricants, through fractionation, straight distillation of crude oil, redistillation of unfinished petroleum derivatives, cracking or other processes (i.e., facilities classified as SIC 2911).

Processing means chemical or physical operations designed to produce from used oil, or to make used oil more amenable for production of, fuel oils, lubricants, or other used oil-derived product. Processing includes, but is not limited to: blending used oil with virgin petroleum products, blending used oils to meet the fuel specification, filtration, simple distillation, chemical or physical separation and re-refining.

Tank means any stationary device, designed to contain an accumulation of used oil which is constructed primarily of non-earthen materials, (e.g., wood, concrete, steel, plastic) which provides structural support.

Used oil means any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result of such use is contaminated by physical or chemical impurities.

Used oil burner means a facility where used oil not meeting the specification requirements in §279.11 is burned for energy recovery in devices identified in §279.61(a).

Used oil fuel marketer means any person who conducts either of the following activities:

- Directs a shipment of off-specification used oil from their facility to a used oil burner; or
- First claims that used oil that is to be burned for energy recovery meets the used oil fuel specifications set forth in §279.11 of this part.

Used oil generator means any person, by site, whose act or process produces used oil or whose act first causes used oil to become subject to regulation.

Used oil processor/re-refiner means a facility that processes used oil.

Used oil transfer facility means any transportation related facility including loading docks, parking areas, storage areas and other areas where shipments of used oil are held for more than 24 hours and not longer than 35 days during the normal course of transportation or prior to an activity performed pursuant to §279.20(b)(2). Transfer facilities that store used oil for more than 35 days are subject to regulation under subpart F of this part.

Used oil transporter means any person who transports used oil, any person who collects used oil from more than one generator and transports the collected oil, and owners and operators of used oil transfer facilities. Used oil transporters may consolidate or aggregate loads of used oil for purposes of transportation but, with the following exception, may not process used oil. Transporters may conduct incidental processing operations that occur in the normal course of used oil transportation (e.g., settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products or used oil fuel.

4.0 References

40 CFR 279	Standards for the Management of Used Oil
40 CFR 279.53	Rebuttable presumption for used oil
40 CFR 279.55	Analysis Plan
40 CFR 279.72	On-specification used oil fuel

5.0 Responsibility

5.1 Project/Branch Manager

The project/branch manager ensures that this program is implemented and followed. The manager ensures that Section 10 of this program is completed to make the program site specific. The manager monitors the processing facility activities to ensure compliance with this program.

5.2 EHS Manager

The EHS Manager monitors adequacy and audits compliance with this program. The EHS Manager acts a technical resource for operational support.

5.3 Supervisors

Supervisors ascertain compliance with every facet of this program relative to employees adhering to and understanding the Used Oil Analysis program as it relates to operations at their Used Oil Processing Facility.

5.4 Employees

Employees for whom this plan applies will maintain compliance with this program and follow all duties as described within.

6.0 Requirements

Owners or operators of used oil processing and re-refining facilities must develop and follow a written analysis plan describing the procedures that will be used to comply with

the analysis requirements of 40CFR 279.53 (Rebuttable Presumption) and, if applicable, 40CFR 279.72 (On-Specification Used Oil Fuel Determination.) The owner or operator must keep the plan at the facility.

6.1 Rebuttable presumption for used oil. At a minimum, the Used Oil Analysis plan must specify the following:

- Whether sample analyses or knowledge of the halogen content of the used oil will be used to make this determination.
- If sample analyses are used to make this determination:
- The sampling method used to obtain representative samples to be analyzed. A representative sample may be obtained using either:
- One of the sampling methods in appendix I of part 261 of this chapter; or
- A method shown to be equivalent under §§260.20 and 260.21 of this chapter;
- The frequency of sampling to be performed, and whether the analysis will be performed on-site or off-site; and
- The methods used to analyze used oil for the parameters specified in §279.53; and
- The type of information that will be used to determine the halogen content of the used oil.

6.2 On-specification used oil fuel. At a minimum, the Used Oil Analysis plan must specify the following if §279.72 is applicable:

- Whether sample analyses or other information will be used to make this determination;
- If sample analyses are used to make this determination:
- The sampling method used to obtain representative samples to be analyzed. A representative sample may be obtained using either:
- One of the sampling methods in appendix I of part 261 of this chapter; or
- A method shown to be equivalent under §§260.20 and 260.21 of this chapter;
- Whether used oil will be sampled and analyzed prior to or after any processing/re-refining;
- The frequency of sampling to be performed, and whether the analysis will be performed on-site or off-site; and
- The methods used to analyze used oil for the parameters specified in §279.72; and

- The type of information that will be used to make the on-specification used oil fuel determination.

7.0 Records Required and Records Retention

Under 40 CFR 279.57, Used Oil Processors must maintain a written Operating Record at the Used Oil Processing Facility. This Operating Record must contain the results of used oil analysis that was performed as described in this Used Oil Analysis Plan. This information must be maintained in the operating record until closure of the facility.

A generator, transporter, processor/re-refiner, or burner who first claims that used oil that is to be burned for energy recovery meets the specifications for used oil fuel under §279.11, must keep copies of analyses of the used oil (or other information used to make the determination) for three years.

8.0 Forms Required

Results of the analysis required by this plan must be maintained at the facility in the facility specific Operating Record. An example of an Operating Record is included at Exhibit 1.

9.0 Exhibits

9.1 Facility Operating Record

10.0 Site Specific Program Information

Check all of the following that apply to this facility;

- ☒ This facility is a Used Oil Transfer Facility
- ☒ This facility is a Used Oil Processing Facility
- ☒ This Facility is a Used Oil Marketer

Will sample analyses or knowledge of the halogen content of the used oil be used to make the Total Halogen Content determination?

Yes

If sample analysis is used to make this determination: What sampling method is used to obtain representative samples to be analyzed.

Extremely viscous liquids ASTM Standard D140-70

(A representative sample may be obtained using either: One of the sampling methods in appendix I of part 261 of this chapter; or A method shown to be equivalent under §§260.20 and 260.21 of this chapter)

What is the frequency of sampling to be performed? (I.e. Weekly, Monthly, Every Load)

Every Load

Is this analysis performed on-site or off-site?

On-site

What analytical Method(s) is/are used to analyze used oil for Total Halogens? (I.e. Dexsil Q 4000, ASTM Method D-5384, EPA SW-846 Method 9077)

EPA SW-846-9077

Is this facility a Used Oil Marketer? Yes ☒ No ☐

(If the facility is a Used Oil Marketer, the following section needs to be completed.)

Will sample analyses or other information be used to make the On-Specification Used Oil Fuel Determination?

Yes

If sample analysis is not used to make the On-Specification Used Oil Fuel Determination, how is this determination made?

N/A

If a sample analysis is used to make this determination: What sampling method is used to obtain representative samples to be analyzed.

Extremely viscous liquids ASTM Standard D140-70

(A representative sample may be obtained using either: One of the sampling methods in appendix I of part 261 of this chapter, or A method shown to be equivalent under §§260.20 and 260.21 of this chapter)

Will Used Oil be sampled and analyzed prior to or after any processing/re-refining?

Prior to, and after processing

At what frequency will the used oil be sampled and analyzed?

Daily

Will this analysis be performed on-site or off-site?

On and off site

What analytical methods are used to analyze used oil for the following parameters?

Arsenic	ASTM D5185
Cadmium	ASTM D5185
Chromium	ASTM D5185
Lead	ASTM D5185
Flash point	D93
Total halogens	SW-846-9077

Hydrocarbon Recovery Services, Inc. March 2008
Used Oil Analysis Plan

Exhibit I – Operating Log Example

TO RECORD ALL MATERIAL RECEIVED
AT _____ SWT FACILITY

DATE _____

[illegible]

Date: _____

Lab Data Log

	Driver	Weight	Halogens in PPM	Water pH or Freeze Pt	Tank #	Individual Samples (lab initials)
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						

Attachment #4

NON-HAZARDOUS WASTE PROFILE SUMMARY

For Facility Use Only



JOB # _____

This non-hazardous waste profile document is designed to be a complete and accurate representation of the waste material offered for disposal. This detailed information will allow us to quickly and correctly determine the best method to handle the material. Please be sure to complete each area of the profile leaving no blanks.

I. GENERATOR INFORMATION

Company Name: FCC Environmental, LLC
Address: 5603 Courtney Ave.
Alexandria VA 22304
Contact Person: Timothy Giles Phone: 443-278-6318 Fax: _____
Waste Site Location: _____
Primary Business activity at this location: used oil recovery / processing

II. BILLING INFORMATION

Company Name: FCC Environmental, LLC
Address: 5800 Farrington Ave
Alexandria VA 22304
Contact Person: Timothy Giles Phone: 443-278-6318 Fax: _____

III. SHIPPING INFORMATION

Anticipated volume: 10,000 gallons
Disposal Frequency: One time ☐ Week ☒ Month ☐ Year ☐
Shipped in: Bulk ☐ Drum ☐

IV. WASTE CHARACTERIZATION

Waste common name: oily water
Description of process generation waste: plant operations

Physical Characteristics

Flashpoint Exact (OF) _____ pH Exact _____
<140 ☐ 140 - 200 ☐ >200 ☒ <2 ☐ 2-5 ☐ 5-9 ☒ 9-12.5 ☐ >12.5 ☐

Specific Gravity (water = 1.0) Exact _____ Reactive: Yes ☐ No ☒
<.8 ☐ 0.8-1.0 ☒ 1.0 ☐ 1.0-1.2 ☐ >1.2 ☐

Phases Single ☒ Double ☐ Multi ☐ Percent Liquid 99% Percent Solid 1%
Viscosity: Low ☐ Medium ☐ High ☐ Odor: None ☐ Mild ☒ Strong ☐

PO BOX 26287 • RICHMOND, VIRGINIA 23260 • 710 HOSPITAL STREET RICHMOND, VIRGINIA 23219
Phone: 804.644.2800 • Fax: 804.644.1335

Website: www.recobio.com • Email: info@recobio.com

AQUA CLEAN ENVIRONMENTAL OF VIRGINIA, LLC dba RECO BIOTECHNOLOGY



Material Composition:

Constituent water
other oil, glycol

Circle

Concentration ppm or %
90 - 99 %
10 - 10 %

Does the material contain levels at or above the following concentrations?

EPA Limit (mg/L)		YES	NO			YES	NO
Arsenic	5.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hexachlorobenzene	0.13	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Barium	100.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hexachlorobutadiene	0.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Benzene	0.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hexachloroethane	3.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Cadmium	1.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Lead	5.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Carbon Tetrachloride	0.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Lindane	0.40	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chlordane	0.03	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Mercury	0.20	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chlorobenzene	100.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Methoxychlor	10.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chloroform	6.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Methyl ethyl ketone	200.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Chromium	5.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Nitrobenzene	2.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
o-Cresol	200.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pentachlorophenol	100.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
m-Cresol	200.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pyridine	5.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
p-Cresol	200.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Selenium	1.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Cresol	200.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Silver	5.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2,4-D	10.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Tetrachlorethylene	0.70	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,4-Dichlorobenzene	7.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Toxaphene	0.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,2-Dichloroethane	0.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Trichloroethylene	0.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>
1,1-Dichloroethylene	0.70	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2,4,5-Trichlorophenol	400.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2,4-Dinitrotoluene	0.13	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2,4,6-Trichlorophenol	2.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Endrin	0.02	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2,4,5-TP (Silvex)	1.00	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Heptachlor	0.01	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Vinyl chloride	0.20	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VI. GENERATOR CERTIFICATION

The submitted information is based on:

Generator Knowledge: ☒ Analytical ☐ Sampling Method ☐ Grab ☐ Composite ☐

I hereby certify that all the information submitted in this and attached documents is complete and accurate to the best of my knowledge.

Authorized Signature

Title

Date

PO BOX 26287 • RICHMOND, VIRGINIA 23260 • 710 HOSPITAL STREET RICHMOND, VIRGINIA 23219

Phone: 804.644.2800 • Fax: 804.644.1335

Website: www.recobio.com • Email: info@recobio.com

AQUA CLEAN ENVIRONMENTAL OF VIRGINIA, LLC dba RECO BIOTECHNOLOGY

Attachment #5



Environmental Services

Telephone: 703-461-2679

Fax: 703-370-8276

FUEL OIL ANALYSIS

Date: 4/13/2012

SAMPLING INFORMATION

LOCATION: FCC - Alexandria Plant INVOICE#113858-62
ADDRESS: 5501 Courtney Ave.
CITY: Alexandria STATE: VA Zip: 22304

Type: Top: Middle: Tank #'s: 10,11
Bottom: Composite: XXXX Gallons: 48,000

Sampled by: Tony Dockett Date: 4/13/2012

PRODUCT IDENTIFICATION: ASTM D-6448 #4 FUEL OIL

TEST INFORMATION

TEST	METHOD	RESULT	REGULATORY L. LIMIT
Gravity, API @ 60° F	D 1298	29.4	
FLASH POINT PMCC, °F	D 93	>200	>100°F
Sulfur, X-Ray, wt. %	D 4294	0.2%	
Ash, wt. %	D 482	0.3%	
Lead, ppm	ASTM D5185	9	<100 ppm
Arsenic, ppm	ASTM D5185	1	<5 ppm
Cadmium, ppm	ASTM D5185	<0.5	<2 ppm
Chromium, ppm	ASTM D5185	0.7	<10 ppm
CB, ppm	SW-846-8081	<2	<2 ppm
Viscosity, SSU @ 100°F	D 2161	190	
TOTAL HALOGEN, PPM	SW-846-9077	520	
Water by Distillation, vol. %	D 95	2.8%	
Sediment and Water, centrifuge, vol %	D96	0.1	
Sediment by Extraction vol. %	D473	0.1	

I certify the analyses to be accurate and that the resultant materials represented herein meet the on-specification regulatory requirements for fuel oil.

Analyst:

Signature:

Tony Dockett

Date: 13-Apr

* The regulatory limit stated above reflects the Federal EPA limit for on-specification fuel oil as defined in 40 CFR 279.11. The on-specification limit for PCBs is imposed by 40 CFR 761.20(e). These regulatory limits may be less stringent than any site-specific permit requirement that may be held by the consumer. Please reference any applicable permits prior to acceptance to ensure compliance.



Environmental Services

Telephone: 703-461-2679

Fax: 703-370-8276

FUEL OIL ANALYSIS

Date: 4/14/2012

SAMPLING INFORMATION

LOCATION: FCC. - Alexandria Plant INVOICE# 113862-66
ADDRESS: 5501 Courtney Ave.
CITY: Alexandria STATE: VA Zip: 22304

Type: Top: _____ Middle: _____ Tank #'s: 10,11
Bottom: _____ Composite: XXXX Gallons: 48,000

Sampled by: Kyle Watson Date: 4/14/2012

PRODUCT IDENTIFICATION: ASTM D-6448 #4 FUEL OIL

TEST INFORMATION

TEST	METHOD	RESULT	REGULATORY L. LIMIT
Gravity, API @ 60° F	D 1298	29.4	
FLASH POINT PMCC, °F	D 93	>190	>100°F
Sulfur, X-Ray, wt. %	D 4294	0.2%	
Ash, wt. %	D 482	0.3%	
Lead, ppm	SW-846-7000B	7	<100 ppm
Arsenic, ppm	SW-846-7000B	<0.5	<5 ppm
Cadmium, ppm	SW-846-7000B	<0.5	<2 ppm
Chromium, ppm	SW-846-7000B	0.8	<10 ppm
PCB, ppm	SW-846-8081	<2	< 2 ppm
Viscosity, SSU @ 100°F	D 2161	200	
TOTAL HALOGEN, PPM	SW-846-9077	533	
Water by Distillation, vol. %	D 95	2.2%	
Sediment and Water, centrifuge, vol %	D96		
Sediment by Extraction vol. %	D473	0.1	

I certify the analyses to be accurate and that the resultant materials represented herein meet the on-specification regulatory requirements for fuel oil.

Analyst:

Signature: Kyle Watson 

Date: 14-Apr

* The regulatory limit stated above reflects the Federal EPA limit for on-specification fuel oil as defined in 40 CFR 279.11. The on-specification limit for PCBs is imposed by 40 CFR 761.20(e). These regulatory limits may be less stringent than any site-specific permit requirement that may be held by the consumer. Please reference any applicable permits prior to acceptance to ensure compliance.

Attachment #6

2.0 EMERGENCY COORDINATORS:

Note: At all times, 24 hours per day, seven days a week, facility personnel should be able to contact either the principal or alternate emergency coordinator.

Principal: Plant Manager

Name: Timothy Giles
Work: (703) 370-8155
Cell: (443) 278-6318

Alternate: Transportation Manager

Name: Carl Dorr
Work: (703) 461-2666
Cell: (443) 278-4181

Alternate: Branch Manager

Name: Bernard Snyder
Work: (703) 461-2662
Cell: (703) 929-5878

The emergency coordinator must be familiar with all aspects of the facility, including, but not limited to, evacuation and spill control procedures and emergency equipment operation. This plan must be reviewed annually. The emergency coordinator is responsible for seeing that all employees are properly trained in emergency response.

Attachment #7

FCC environmental

Receiving Report

298039

- ☒ 5501 Courtney Avenue, Alexandria, VA 22304
(703) 370-8124 • EPA# VAD980537302
- ☐ 2353 Lanier Road, Rockville, VA 23146
(804) 749-8344 • EPA# VAD988222998
- ☐ 3481 South Military Highway, Chesapeake, VA 23323
(757) 558-3029 • EPA# VAD000372995
- ☐ Westbound Lane Rt. 460, Montvale, VA 24122
(540) 947-2864 • EPA# VAR00006387
- ☐ 2115 Speedrail Court, Concord, NC 28025
(704) 455-6863 • EPA# NCR000003319

HYDROCARBON SERVICES

- ☐ 505 South Market Street, Wilmington, DE 19801
(800) 222-2511 • EPA ID# DED984073692
- ☐ 250 E. 22nd St., Bayonne, NJ 07002
(800) 222-2511 • EPA ID# NJR000025486
- ☐ 6305 East Lombard Street, Baltimore, MD 21224
(410) 633-0606 • EPA ID# MDD985389816
- ☐ 201 Lindsay Road, Zellenople, PA 16063
(724) 453-0623 • EPA ID# PAD982700783
- ☐ _____

Date <u>1-12-12</u>	Transporter # _____	Tank # <u>5</u>
------------------------	------------------------	--------------------

Section 1 - Received From

Company Name <u>FCC ENVIRONMENTAL</u>
Address <u>Troy #1</u> <u>266965</u>
EPA ID# _____

Section 2 - Description of Product

HM
<input type="checkbox"/> <input type="checkbox"/> Non-DOT Regulated Used Oil
<input type="checkbox"/> Fuel Oil, Combustible Liquid, 3, NA 1993, PG III
<input type="checkbox"/> Petroleum Oil, Combustible Liquid, 3, NA 1770, PG III
<input type="checkbox"/> RQ, Other Regulated Substances, Liquid n.o.s., 9, NA 3082, PG III (Ethylene Glycol)
<input type="checkbox"/> Fuel, aviation, turbine engine, 3, UN 1863, PG III
<input type="checkbox"/> Flammable liquid, n.o.s. (Petroleum Product), 3, UN 1993, PG III
<input checked="" type="checkbox"/> <input type="checkbox"/> Oily Water, Non-DOT Regulated
<input type="checkbox"/> _____

Section 3 - Transporter

Name <u>FCC ENVIRONMENTAL TRANS</u>
Address <u>OKLAHOMA, OK</u>
EPA ID# _____

Section 4 - Scale Readings

Scale <u>(901301)</u>	Product _____
Truck #: <u>225</u>	Weight/Gal: <u>8.456</u>
Gross Weight: <u>50240</u>	Gross Gal: <u>2254</u>
Tare Weight: <u>31180</u>	
Net Weight: <u>19060</u>	

Section 5 - Product Analysis

Oil <u>85%</u>	Antifreeze/Water
Water:	Glycol %:
Sediment:	Freeze Pt °F:
BS&W:	pH:
Halogens: <u>6158 ppm</u>	Urea:
Flash Point °F:	Other:
PCB:	Other:
Arsenic:	
Cadmium:	
Chromium:	
API/PPG:	

Section 6 - Payment

<input type="checkbox"/> Pay	<input type="checkbox"/> Charge	Amount
Gallons:	Price/Gal:	
Freight		
Misc:		
Sub-Total		
Sales Tax		
Total		
Purchase Order Number _____		
Sales Person _____		Commissionable <input type="checkbox"/>

Comments:

Please remit all payments to:
Hydrocarbon Recovery Services, Inc.
 Box 757600
 Philadelphia, PA 19175-7600

Transporter Signature

Facility Signature

White - Office

Yellow - Plant

Pink - Transporter

Goldenrod - Customer/Driver



Rebuttable Presumption Worksheet

This form is to be completed for each load that is found to have a chlorine level exceeding 1,000ppm. If the load is successfully rebutted, this form and accompanying documentation is to be attached to the receiving report for that load and filed in the facility's records.

1-12-12

Date

6158 ppm

Chlorine level

Transporter/Generator

Yes

No

1. Does the load consist of multiple stops?

• If the load consists of only one generator, continue through the worksheet and answer all questions. If the one generator is a CESQG or DIY, follow procedures in question #2. If the one generator is not a CESQG or DIY, follow the rebuttal procedures in question #4.

2. Is each stop either a conditionally exempt small quantity or a do-it-yourself collection center? (see generator certification on service receipt)

• If yes, attach a copy of the CESQG certifications, DIY certifications and the manifest to the receiving report and unload.

If on a FCC collection vehicle, obtain the drivers individual samples and analyze only the non-CESQG or DIY stops for chlorine.

3. Are all of the non-CESQG or DIY stops under 1,000-ppm chlorine?

• If yes, attach a copy of the CESQG and/or DIY certifications, manifest and the sample results for the non-CESQG and DIY stops to the receiving report and unload.

4. If a non-CESQG or DIY stop exceeds 1,000-ppm chlorine, contact that customer or responsible sales representative to obtain a rebuttal for the material.

• If a rebuttal is obtained, attach all CESQG and/or DIY certifications, analytical results for the non-CESQG and DIY stops, rebuttal certifications for the non-CESQG and DIY stops, and a copy of the manifest to the receiving report and unload.

5. To successfully rebut the hazardous waste presumption, the customer must be able to do one of the following:

- Certify that they are a Conditionally Exempt Small Quantity Generator
- Supply analytical information that certifies the oil does not contain significant concentrations of hazardous halogenated compounds
- Certify the material is not hazardous through intimate process knowledge
- Certify that the chlorine is derived from metalworking fluids containing chlorinated paraffins
- Certify that the contamination is derived from CFC's removed from refrigeration units, and that the CFC's are destined for reclamation

6. If a non-CESQG or DIY stop is unable to be successfully rebutted, quarantine the truck, do not unload and contact EH&S.

Load Determination:

Accepted

Receiving report number

298039

Signature

Facility Representative Signature

Comments

NUMBER
PAGE OF
CALL TYPE PROBLEM CODE ORDER ORIGIN

PRIORITY

P.O. NUMBER

CUSTOMER CONTACT

PHONE NUMBER

SITE NUMBER NAME AND ADDRESS

Elevator Control service
8231 Penn Randall Rd
Upper Marlboro, MD

CALL WAS TAKEN ON AT BY

ROUTE

ASSIGNED TO

M/A NUMBER

PROMISE DATE, TIME

PROBLEM SYNOPSIS, AS REPORTED

VEHICLE NO. 225	TRAILER NO.	UPTIME UNIT NO. 961367	TT 1.75	TM 40	ST .5	ARRIVE DATE 1/12	ARRIVE TIME 113	CLOSE DATE 1/12	CLOSE TIME 143	JOB COMPLETE YES
PART / DESCRIPTION		U/M	QUANTITY	HM	SHIPPING DESCRIPTION			SERIAL #	CONT	TYPE
M/V/L			4		Non DOT Regulated oily water			GLYCOL	PH	BRK
CalDWGA			770g					SNIFTER	AC-DAT	

Reuse Qualification Statement

By signing this document, I hereby certify that I understand the used FCC Environmental, LLC degreasing fluid (i.e. Mineral spirits, petroleum naphtha) returned to FCC Environmental, LLC for inclusion in the FCC Environmental, LLC Reuse program will be utilized as an effective substitute for chemical product. For the purpose of qualifying to participate in the program, I further certify that any used degreasing fluid so returned to FCC Environmental, LLC has not been mixed with hazardous waste or other objectionable substances.

All constituents that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use of the solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational procedures and based on this review do willing make this true, accurate and complete certification.

Reuse Solvent QA & QC

Yes	No	Rep Initials
<input type="checkbox"/>	<input type="checkbox"/>	Used solvent passed visual inspection
<input type="checkbox"/>	<input type="checkbox"/>	Used solvent has no unusual odor
<input type="checkbox"/>	<input type="checkbox"/>	Parts Cleaner is clean (front/back)
<input type="checkbox"/>	<input type="checkbox"/>	Fusible link operational
<input type="checkbox"/>	<input type="checkbox"/>	Light assembly is in good working order
<input type="checkbox"/>	<input type="checkbox"/>	Lid is unobstructed
<input type="checkbox"/>	<input type="checkbox"/>	Parts Cleaner is properly grounded

Authorization Signature

I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document.

K. DADISMAN
PRINT CUSTOMER NAME

K. Dadisman
CUSTOMER SIGNATURE / DATE

Initial if Conditionally-Exempt Small Quantity Generator as defined in 40 CFR 261.5
Initial if Do-it-yourself collection center

Generator
EPA ID#

The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by FCC Environmental, LLC does not contain any PCB's defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261.3. The material collected is a used oil as defined in 40 CFR part 279; the GENERATOR certifies that the total halogen content is less than 1,000 ppm. The GENERATOR hereby certifies that the reputable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for any and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I certify to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR.

Shipping Declaration:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter Information:

FCC Environmental, LLC
523 N. Sam Houston Parkway East, Suite 400
Houston, TX 77060
US DOT ID#: 1688621
EPA ID#: FCR000078094

EMERGENCY CONTACT: CHEMTREC (800) 424-9300

Designated Facility
5803 Courtney
Alexandria, VA
(888) 747-2323
EPA ID#: FCR000078094

J. McKee
DRIVER SIGNATURE / DATE

Ch. McKee
RECEIVED AT PLANT / DATE

168756

ORIGINAL

CUSTOMER CONTACT *Vohro*
PHONE NUMBER

SITE NUMBER NAME AND ADDRESS
Dubrook Concrete
44146 Wade Dr
Chantilly VA

CALL WAS TAKEN ON _____ AT _____ BY _____

PROBLEM SYNOPSIS, AS REPORTED

ROUTE _____
ASSIGNED TO *Troy M. Doe*
M/A NUMBER _____ PROMISE DATE/TIME _____

VEHICLE NO. 225	TRAILER NO. 125	UPTIME UNIT NO. 961361	TT 125	TM 49	ST 1hr	ARRIVE DATE 7/12	ARRIVE TIME 1130	CLOSE DATE 7/12	CLOSE TIME 1230	WORK COMPLETE YES	
PART / DESCRIPTION		U/M	QUANTITY	HM	SHIPPING DESCRIPTION			SERIAL #		# CONT	TYPE
								GLYCOL	pH	BRK	SNIFFER
MUAC			4								
COL-OWGA			650g		Non DOT Regulated Oil/Water						
Solids			0g								

Reuse Qualification Statement
By signing this document, I hereby certify that I understand the used FCC Environmental, LLC degreasing fluid (i.e. Mineral spirits, petroleum naphtha) returned to FCC Environmental, LLC for inclusion in the FCC Environmental, LLC Reuse program will be utilized as an effective substitute for chemical product. For the purpose of qualifying to participate in the program, I further certify that any used degreasing fluid so returned to FCC Environmental, LLC has not been mixed with hazardous waste or other objectionable substances.
I, the constituent that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use of the solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational procedures and based on this review do willing make this true, accurate and complete certification.

Reuse Solvent QA & QC

<input type="checkbox"/> Yes	<input type="checkbox"/> No	Rep Initials _____
<input type="checkbox"/>	<input type="checkbox"/>	Used solvent passed visual inspection
<input type="checkbox"/>	<input type="checkbox"/>	Used solvent has no unusual odor
<input type="checkbox"/>	<input type="checkbox"/>	Parts Cleaner is clean (front/back)
<input type="checkbox"/>	<input type="checkbox"/>	Fusible link operational
<input type="checkbox"/>	<input type="checkbox"/>	Light assembly is in good working order
<input type="checkbox"/>	<input type="checkbox"/>	Lid is unobstructed
<input type="checkbox"/>	<input type="checkbox"/>	Parts Cleaner is properly grounded

Authorization Signature
I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above on the reverse side of this document.
Chad Hopper
PRINT CUSTOMER NAME
Chad Hopper
CUSTOMER SIGNATURE
7/12/12
DATE

Generator
Initial if Conditionally Exempt Small Quantity Generator as defined in 40 CFR 261.5
Initial if Do-it-yourself collection center
Generator _____
EPA ID# _____

The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by FCC Environmental, LLC does not contain any PCB's as defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261.22. The material collected is a used oil as defined in 40 CFR part 279; the GENERATOR certifies that the total halogen content is less than 1,000 ppm. The GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for proper disposal including; but not limited to; proper disposal, testing, and transportation if the material contains PCB's or is determined to be hazardous waste. I certify to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR.

Shipping Declaration:
This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled in accordance with proper condition transportation according to the applicable regulations of the Department of Transportation.

Transporter Information:
FCC Environmental, LLC
523 N. Sam Houston Parkway East, Suite 400 Houston, TX 77060
US DOT ID#: 1888821
EPA ID#: TXR000078094

Emergency Contact: CHEMTREC (800) 424-9300

Designated:
5803 Court
Alexandria, VA
(888) 748-5555
EPA ID# TXR000078094

Troy M. Doe
DRIVER SIGNATURE / DATE
7/12/12
DATE
RECEIVED AT PLANT / DATE



NUMBER

PAGE 65

CALL TYPE	PROBLEM CODE	ORDER ORIGIN
1	1	1
2	2	2
3	3	3
4	4	4
5	5	5
6	6	6
7	7	7
8	8	8
9	9	9
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94	94	94
95	95	95
96	96	96
97	97	97
98	98	98
99	99	99
100	100	100

PRIORITY

CALL WAS TAKEN ON _____ AT _____ BY _____

ROUTE ~~11A~~

ASSIGNED TECH

PROBLEM SYNOPSIS, AS REPORTED

PROBLEM SYNOPSIS, AS REPORTED
Pump water from parts washer tank

M/A NUMBER

PROMISE DATE, TIME

Use Qualification Statement

By signing this document, I hereby certify that I understand the used FCC Environmental, LLC degreasing fluid (i.e. Mineral spirits, petroleum naphtha) returned to FCC Environmental, LLC for inclusion in the FCC Environmental, LLC Reuse program will be utilized as an effective substitute for chemical product. For the purpose of qualifying to participate in the program, I further certify that any used degreasing fluid so returned to FCC Environmental, LLC has not been mixed with hazardous waste or other objectionable substances.

I constituents that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use of the solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational procedures and based on this review do willing make this true, accurate and complete certification.

Use Solvent QA & QC

15	No		Used solvent passed visual inspection
		<input type="checkbox"/>	Used solvent has no unusual odor
		<input type="checkbox"/>	Parts Cleaner is clean (front/back)
		<input type="checkbox"/>	Fusible link operational

Yes	No	Rep Initials _____
<input type="checkbox"/>	<input type="checkbox"/>	Light assembly is in good working order
<input type="checkbox"/>	<input type="checkbox"/>	Lid is unobstructed
<input type="checkbox"/>	<input type="checkbox"/>	Parts Cleaner is properly grounded

Authorization Signature

agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document.

2. Kerry Conley
PRINT CUSTOMER NAME

CUSTOMER SIGNATURE / DATE

Initial if Conditionally Exempt Small Quantity Generator
as defined in 40 CFR 261.5
Initial if Do-it-yourself collection center

Generator

EPA ID#

The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by FCC Environmental, Inc. does not contain any PCB's as defined in 40 CFR 781 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as per 40 CFR 261. The material collected is a used oil as defined in 40 CFR part 279; the GENERATOR certifies that the total halogen content is less than 0.1% and the GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR warrants that the waste is analyzed at its cost, including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be hazardous waste. I hereby certify the above to the best of my knowledge; the information presented herein is correct and accurate, and I am authorized to sign for the GENERATOR.

Shipping Declaration:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter Information:

FCC Environmental, LLC
523 N. Sam Houston Parkway East, Suite 400
Houston, TX 77060

US DOT ID#: 1688621
EPA ID#: TX0000078094

EMERGENCY CONTACT CHEMTREC (800) 424-9800

Designated Facility
5603 Courtnay Avenue
Alexandria, VA 22304
(888) 749-8341
EPA ID: VA000053700

DRIVER SIGNATURE / DATE

RECEIVED AT PLANT

152453

ORIGINAL

NAME:	TECH #	DATE	START TIME	STOP TIME	TOTAL HOURS	TRUCK #
Troy McFree		1/12/12	430	330	11 hrs	225

ID #	START TIME	NAME OF CUSTOMER	STREET	QTY. PICKED UP	COMMENTS
SO #	STOP TIME		CITY/STATE/ZIP		
	830	Palmer German Auto	785 Line K Rd	1205 gaw	2005/12/3
	1015		Federick MD		

ID #	START TIME	NAME OF CUSTOMER	STREET	QTY. PICKED UP	COMMENTS
SO #	STOP TIME		CITY/STATE/ZIP		
	1130	Ruback Concrete	44116 Wade Dr	650 gaw	
	1230		Chantilly VA		

ID #	START TIME	NAME OF CUSTOMER	STREET	QTY. PICKED UP	COMMENTS
SO #	STOP TIME		CITY/STATE/ZIP		
	115	Elevator Control Svc	8231 Kemp Road	770g	Sh
	1245		Upper Marlboro MD		

ID #	START TIME	NAME OF CUSTOMER	STREET	QTY. PICKED UP	COMMENTS
SO #	STOP TIME		CITY/STATE/ZIP		

ID #	START TIME	NAME OF CUSTOMER	STREET	QTY. PICKED UP	COMMENTS
SO #	STOP TIME		CITY/STATE/ZIP		

TOTALS

SIEMENS SITES LOAD/UNLOAD TIMES

LOCATION	START TIME	STOP TIME	TOTAL TIME	LOAD	UNLD	QTY
Alex VA	215	300	175		2	22540

OFFSITE DISPOSAL UNLOADING TIMES

LOCATION	S.O. OR MANIFEST #	START TIME	STOP TIME	TOTAL TIME	QTY	PRODUCT

OTHER DOWN TIME CODES

LOCATION	START TIME	STOP TIME	TOTAL TIME	CODE	REASON
Alex VA	435	600	165	TRIP	PRE
	600	630	30	TRIP	PRE
	630	530	15	TRIP	PRE

BRAK - take break
 FLOT - floating holiday
 FUEL - fuel truck
 FUNE - funeral leave
 HOLI - holiday
 HOTL - hot load down time
 OODH - out of DOT driving hours
 PAPR - paperwork
 SAFE - safety meeting
 SALE - sales calls
 SICK - sick
 TRIP - pre-trip/post-trip

INVE - inventory adjustment
 JURY - jury duty
 LOAD - load time
 LUNC - eat lunch
 MEDT - medical leave
 MISC - give space
 TRAN - training
 UNLD - unload time
 VACA - vacation
 VEHL - vehicle repair/maint
 WASH - wash truck/pump
 YARD - give space



Manager Signature

Date

SERVICE ACTIVITY REPORT

Attachment #8



May 1, 2012

Justin Young
Environmental Scientist / Inspector
US Environmental Protection Agency- Region III
701 Maples Road
Fort Meade, MD 20755
Email: young.justin@epa.gov

Re: EPA Facility Inspection at FCC Environmental, LLC Alexandria, VA Facility

Mr. Young,

As we discussed on April 19, 2012 during the closing conference FCC Environmental, LLC (FCC) is providing the additional information to clarify some issues.

1) EPA concern: Hazardous waste generator status of FCC Environmental's customers that generate used oil and oily water containing over 1,000 Parts per Million (PPM) halogens.

FCC response: 40 CFR 279 allows the Conditionally Exempt Small Quantity Generator (CESQG) exemption for rebutting used oil and oily water for halogens over 1,000 PPM. Used oil rebuttals for high halogens documentation including service orders and the non-conforming load log were supplied during the inspection. Customers acknowledge their CESQG status by initialing the appropriate statement on the service orders.

2) EPA concern: A hazardous waste determination needs to be made for the two solidification boxes in the facility containing used oil solids that are drained of the free flowing oil.

FCC response: The two solidification boxes contain residual oily waste that is tested per the used oil regulations upon acceptance per the used oil regulations and determined to be non-hazardous. A Toxicity Characteristics Leaching Procedure (TCLP) test was run to make a hazardous waste determination for the: a) back box near the oil water separator and b) front small collection truck filters basket. The TCLPs have been provided for the back box and front box (attachment 1). The results of the TCLP were determined to be non-hazardous.

3) EPA concern: A hazardous waste determination needs to be made for the oily water that is dropped from the used oil processing tanks.

FCC response: The oily water that is dropped from the used oil processing tanks was transported to Reco Biotechnology. A TCLP was run for the oily water (attachment 1) that is pumped from the unprocessed used oil and was determined to be non-hazardous. Tim Giles provided a copy of the waste characterization profile from Reco to the EPA during the inspection (attachment 2).

If you have any questions, feel free to contact me at 703-929-5878.

Harwood K. Smith

Woody Smith, Branch Manager

Attachments:

- 1) TCLP for solidification back box, front box and oily water (items 2 and 3)
- 2) Profile for oily water sent to Reco Biotechnology (item 3)
- 3) SPCC/ODCP plan personnel updated page (item 6)
- 4) Biennial used oil report 2011 calendar year (item 8)

Pictures:

- 1) Picture one- Tank 6 labeled "used oil" (item 5)
- 2) Picture two- Tank 7 labeled "used oil" (item 5)
- 3) Picture three- Tank 8 labeled "used oil" (item 5)
- 4) Picture four- Tank 9 labeled "used oil" (item 5)
- 5) Picture five- White poly and Black poly tanks labeled "antifreeze" (item 5)
- 6) Picture six- Tank labeled "distillate fuel" (item 5)
- 7) Picture seven- Universal waste storage area (item 7)
- 8) Picture eight- Universal waste- Lamps (item 7)
- 9) Picture nine- Universal waste- Aerosol Cans (item 7)
- 10) Picture ten- Universal waste- Batteries (item 7)
- 11) Picture eleven- Universal waste- Paint Waste (item 7)



Alexandria Branch
5800 Farrington Ave.
Alexandria, VA 22304
Ph: (703) 461-2662
Fax: (703) 370-8067

February 27, 2012

RCRA Compliance
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193

Re: Biennial Report

To Whom It May Concern:

As per 40 CFR 279.57(b), the following information is provided for the FCC Environmental, LLC
Alexandria Virginia Plant Facility for the 2011 calendar year.

EPA ID #:	VAD980537302
Facility Name:	FCC Environmental, LLC
Address:	5501 Courtney Avenue Alexandria, VA 22304
Quantity and Process:	5,934,822 gallons of used oil was accepted for processing in 2011. The process consists of settling, thermal dehydration and filtration.

If you have any questions or require any additional information, please feel free to contact me at
(443) 278-6318.

Sincerely,

Tim Giles
Plant Manager
Alexandria Branch Facility

**Table 3
Emergency Call Listing**

Date of Last Update:

Facility Name and Address:

Owner Name:

Facility Identification Number:

	Organization	Phone No.	Date/Time of Notification	Contact's Name (Printed)
1.	Company Branch Manager	703-461-2662 703-929-5878		Woody Smith
2.	EHS Manager or EHS Director	443-463-1598 813-754-1504		Vinnie Glorioso Scott Crandall
3.	Transportation Manager	703-461-2666 443-278-4181		Carl Dorr
4.	Plant Manager	443-278-6318		Tim Giles
5.	Engineering Director	703-461-2663 703-932-8480		Drew Frye
6.	Field Service Coordinator	410-388-9745 443-309-8364		Tammy Danjou
7.	Field Service Manager	410-388-9745 443-463-7822		Jim Gaunch
8.	Emergency Response	800-404-8037 410-636-3700		Triumvirate Environmental
9.	Emergency Response	800-229-4671 757-543-5718		Industrial Marine Service
10.	National Response Center (NRC)	1-800-424- 8802		
11.	Local Response Team (Fire Dept.)	911		
12.	Fire Marshall (24 hours)	911 703-519-3300 x118		
13.	Virginia Department of Environmental Quality (VDEQ)	703-583-3800		
14.	State Police	911		
15.	Local Emergency Planning Committee (LEPC)	703-838-4007		Thomas Hawkins
16.	Local Water Supply System – Virginia American Water Company	703-549-7080		
17.	Wastewater Treatment Plant – Alexandria Sanitation Authority	703-549-3381		
18.	Hospitals	703-212-8310 703-504-3000		
19.	United States Coast Guard – Hampton Roads Sector	757-668-5555		

Analytical Report for

FCC Environmental, LLC

Certificate of Analysis No.: 12042501

Project Manager: Woody Smith

Project Name : Alexandria

Project Location: Alexandria



April 30, 2012

Phase Separation Science, Inc.

6630 Baltimore National Pike

Baltimore, MD 21228

Phone: (410) 747-8770

Fax: (410) 788-8723



Sample Summary
Client Name: FCC Environmental, LLC
Project Name: Alexandria

Project ID: N/A

Work Order Number: 12042501

The following samples were received under chain of custody by Phase Separation Science (PSS) on 04/25/2012 at 09:45 am

Lab Sample Id	Sample Id	Matrix	Date/Time Collected
12042501-001	Front Separator (Solids)	SOIL	04/24/2012 13:00
12042501-002	Rear Separator (Solids)	SOIL	04/24/2012 13:00
12042501-003	Used Oil Tanks #8,9 (Water)	WATER	04/24/2012 13:00

Please reference the Chain of Custody and Sample Receipt Checklist for specific container counts and preservatives. Any sample conditions not in compliance with sample acceptance criteria are described in Case Narrative Summary.

Notes:

1. The presence of common laboratory contaminants such as acetone, methylene chloride and phthalates, may be considered a possible laboratory artifact. Where observed, appropriate consideration of data should be taken.
2. The following analytical results are never reported on a dry weight basis: pH, flashpoint, moisture and paint filter test.
3. Drinking water samples collected for the purpose of compliance with SDWA may not be suitable for their intended use unless collected by a certified sampler [COMAR 26.08.05.07.C.2].

Standard Flags/Abbreviations:

- B A target analyte or common laboratory contaminant was identified in the method blank. Its presence indicates possible field or laboratory contamination.
- C Results Pending Final Confirmation.
- E The data exceeds the upper calibration limit; therefore, the concentration is reported as estimated.
- Fail The result exceeds the regulatory level for Toxicity Characteristic (TCLP) as cited in 40 CFR 261.24 Table 1.
- J The target analyte was positively identified below the reporting limit but greater than the LOD.
- LOD Limit of Detection. An estimate of the minimum amount of a substance that an analytical process can reliably detect. An LOD is analyte and matrix specific.
- ND Not Detected at or above the reporting limit.
- RL PSS Reporting Limit.
- U Not detected.

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PHASE SEPARATION SCIENCE, INC.



CERTIFICATE OF ANALYSIS

No: 12042501

FCC Environmental, LLC, Alexandria, VA

April 30, 2012

Project Name: Alexandria

Project Location: Alexandria

DRAFT

Sample ID: Front Separator (Solids) Date/Time Sampled: 04/24/2012 13:00 PSS Sample ID: 12042501-001
Matrix: SOIL Date/Time Received: 04/25/2012 09:45

Flash Point

Analytical Method: SW-846 1020 A

	Result	Units	RL	Flag	Dil	Prepared	Analyzed	Analyst
Flash Point	> 200	Deg F	70		1	04/27/12	04/27/12 21:00	1043

TCLP Metals

Analytical Method: SW-846 6020 A

Preparation Method: 3010A

Pending Confirmation

	Result	Units	RL	Flag	Dil	TCLP Limit	Prepared	Analyzed	Analyst
Arsenic	ND	mg/L	0.05		1	5	04/27/12	04/28/12 06:23	1034
Barium	ND	mg/L	1		1	100	04/27/12	04/28/12 06:23	1034
Cadmium	ND	mg/L	0.05		1	1	04/27/12	04/28/12 06:23	1034
Chromium	0.24	mg/L	0.05	C	1	5	04/27/12	04/28/12 06:23	1034
Lead	0.083	mg/L	0.05	C	1	5	04/27/12	04/28/12 06:23	1034
Mercury	ND	mg/L	0.002		1	0.2	04/27/12	04/28/12 06:23	1034
Selenium	ND	mg/L	0.05		1	1	04/27/12	04/28/12 06:23	1034
Silver	ND	mg/L	0.05		1	5	04/27/12	04/28/12 06:23	1034

TCLP Organochlorine Pesticides

Analytical Method: SW-846 8081 B

Preparation Method: 3510C

	Result	Units	RL	Flag	Dil	TCLP Limit	Prepared	Analyzed	Analyst
Chlordane	ND	mg/L	0.027		4	0.03	04/26/12	04/27/12 16:08	1029
Endrin	ND	mg/L	0.0011		4	0.02	04/26/12	04/27/12 16:08	1029
Gamma-BHC (Lindane)	ND	mg/L	0.0011		4	0.4	04/26/12	04/27/12 16:08	1029
Heptachlor	ND	mg/L	0.0011		4	0.008	04/26/12	04/27/12 16:08	1029
Methoxychlor	ND	mg/L	0.0011		4	10	04/26/12	04/27/12 16:08	1029
Toxaphene	ND	mg/L	0.027		4	0.5	04/26/12	04/27/12 16:08	1029
Heptachlor epoxide	ND	mg/L	0.0011		4	0.008	04/26/12	04/27/12 16:08	1029

TCLP Chlorinated Herbicides

Analytical Method: SW-846 8151 A

Preparation Method: 8151A

	Result	Units	RL	Flag	Dil	TCLP Limit	Prepared	Analyzed	Analyst
2,4-D	0.019	mg/L	0.01		10	10	04/26/12	04/26/12 17:09	1029
2,4,5-TP (Silvex)	ND	mg/L	0.001		10	1	04/26/12	04/26/12 17:09	1029

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PHASE SEPARATION SCIENCE, INC.



CERTIFICATE OF ANALYSIS

No: 12042501

FCC Environmental, LLC, Alexandria, VA

April 30, 2012

Project Name: Alexandria

Project Location: Alexandria

DRAFT

Sample ID: Rear Separator (Solids) Date/Time Sampled: 04/24/2012 13:00 PSS Sample ID: 12042501-002
Matrix: SOIL Date/Time Received: 04/25/2012 09:45

Flash Point

Analytical Method: SW-846 1020 A

	Result	Units	RL	Flag	Dil	Prepared	Analyzed	Analyst
Flash Point	> 200	Deg F	70		1	04/27/12	04/27/12 21:00	1043

TCLP Metals

Analytical Method: SW-846 6020 A

Preparation Method: 3010A

Pending Confirmation

	Result	Units	RL	Flag	Dil	TCLP Limit	Prepared	Analyzed	Analyst
Arsenic	ND	mg/L	0.05		1	5	04/27/12	04/28/12 06:29	1034
Barium	ND	mg/L	1		1	100	04/27/12	04/28/12 06:29	1034
Cadmium	ND	mg/L	0.05		1	1	04/27/12	04/28/12 06:29	1034
Chromium	ND	mg/L	0.05		1	5	04/27/12	04/28/12 06:29	1034
Lead	ND	mg/L	0.05		1	5	04/27/12	04/28/12 06:29	1034
Mercury	ND	mg/L	0.002		1	0.2	04/27/12	04/28/12 06:29	1034
Selenium	ND	mg/L	0.05		1	1	04/27/12	04/28/12 06:29	1034
Silver	ND	mg/L	0.05		1	5	04/27/12	04/28/12 06:29	1034

TCLP Organochlorine Pesticides

Analytical Method: SW-846 8081 B

Preparation Method: 3510C

	Result	Units	RL	Flag	Dil	TCLP Limit	Prepared	Analyzed	Analyst
Chlordane	ND	mg/L	0.0067		1	0.03	04/26/12	04/27/12 15:10	1029
Endrin	ND	mg/L	0.0003		1	0.02	04/26/12	04/27/12 15:10	1029
Gamma-BHC (Lindane)	ND	mg/L	0.0003		1	0.4	04/26/12	04/27/12 15:10	1029
Heptachlor	ND	mg/L	0.0003		1	0.008	04/26/12	04/27/12 15:10	1029
Methoxychlor	ND	mg/L	0.0003		1	10	04/26/12	04/27/12 15:10	1029
Toxaphene	ND	mg/L	0.0067		1	0.5	04/26/12	04/27/12 15:10	1029
Heptachlor epoxide	ND	mg/L	0.0003		1	0.008	04/26/12	04/27/12 15:10	1029

TCLP Chlorinated Herbicides

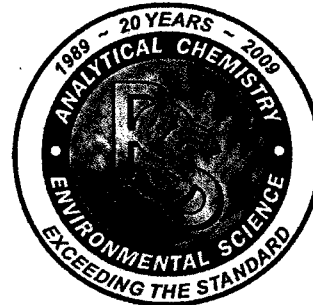
Analytical Method: SW-846 8151 A

Preparation Method: 8151A

	Result	Units	RL	Flag	Dil	TCLP Limit	Prepared	Analyzed	Analyst
2,4-D	ND	mg/L	0.01		10	10	04/26/12	04/26/12 17:42	1029
2,4,5-TP (Silvex)	ND	mg/L	0.001		10	1	04/26/12	04/26/12 17:42	1029

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PHASE SEPARATION SCIENCE, INC.



CERTIFICATE OF ANALYSIS

No: 12042501

FCC Environmental, LLC, Alexandria, VA

April 30, 2012

Project Name: Alexandria

Project Location: Alexandria

DRAFT

Sample ID: Used Oil Tanks #8,9 (Water) Date/Time Sampled: 04/24/2012 13:00 PSS Sample ID: 12042501-003
Matrix: WATER Date/Time Received: 04/25/2012 09:45

RCRA Metals

Analytical Method: SW-846 6020 A

Preparation Method: 3010A

Pending confirmation.

	Result	Units	RL	Flag	Dil	Prepared	Analyzed	Analyst
Arsenic	16	ug/L	10	C	10	04/27/12	04/28/12 03:44	1034
Barium	14	ug/L	10	C	10	04/27/12	04/28/12 03:44	1034
Cadmium	ND	ug/L	10	C	10	04/27/12	04/28/12 03:44	1034
Chromium	ND	ug/L	10	C	10	04/27/12	04/28/12 03:44	1034
Lead	110	ug/L	10	C	10	04/27/12	04/28/12 03:44	1034
Mercury	ND	ug/L	2	C	10	04/27/12	04/28/12 03:44	1034
Selenium	ND	ug/L	10	C	10	04/27/12	04/28/12 03:44	1034
Silver	ND	ug/L	10	C	10	04/27/12	04/28/12 03:44	1034



Phase Separation Science, Inc

Sample Receipt Checklist

Work Order #	12042501	Received By	Rachel Davis
Client Name	FCC Environmental, LLC	Date Received	04/25/2012 09:45:00 AM
Project Name	Alexandria	Delivered By	Client
Project Number	N/A	Tracking No	Not Applicable
Disposal Date	05/30/2012	Logged In By	Rachel Davis

Shipping Container(s)

No. of Coolers	1	Ice	Absent
Custody Seal(s) Intact?	N/A	Temp (deg C)	23
Seal(s) Signed / Dated?	N/A	Temp Blank Present	No

Documentation

COC agrees with sample labels?	Yes
Chain of Custody	Yes

Sampler Name Not Provided
N/A

Sample Container

Appropriate for Specified Analysis?	Yes
Intact?	Yes
Labeled and Labels Legible?	Yes

Custody Seal(s) Intact? Not Applicable
Seal(s) Signed / Dated Not Applicable

Total No. of Samples Received 3

Total No. of Containers Received 3

Preservation

Metals	(pH<2)	N/A
Cyanides	(pH>12)	N/A
Sulfide	(pH>9)	N/A
TOC, COD, Phenols	(pH<2)	N/A
TOX, TKN, NH3, Total Phos	(pH<2)	N/A
VOC, BTEX (VOA Vials Rcvd Preserved)	(pH<2)	N/A
Do VOA vials have zero headspace?		N/A

Comments: (Any "No" response must be detailed in the comments section below.)

For any improper preservation conditions, list sample ID, preservative added (reagent ID number) below as well as documentation of any client notification as well as client instructions. Samples for pH, chlorine and dissolved oxygen should be analyzed as soon as possible, preferably in the field at the time of sampling. Samples which require thermal preservation shall be considered acceptable when received at a temperature above freezing to 6°C. Samples that are hand delivered on the day that they are collected may not meet these criteria but shall be considered acceptable if there is evidence that the chilling process has begun such as arrival on ice.

Received non standard, non certified 1L glass mason jars for all samples.

Samples Inspected/Checklist Completed By:

Rachel Davis

Date: 04/25/2012

Rachel Davis

PM Review and Approval:

Amy Friedlander

Date: 04/25/2012

Amy Friedlander